

UNITED STATES BANKRUPTCY COURT
Southern District of Indiana

In re:)
)
William Jay Ferguson,) Case No. 23-02029-JJG-13
Debtor)
)
)
)
)

MOTION FOR RELIEF FROM ORDER
PURSUANT TO FED.R.BANKR.P. 9024

Debtor, by counsel Ryan P Worden, requests relief from the Courts Order dated October 13, 2023, which Ordered Dismissal for failure to file an Amended Plan, and in support of this motion, states:

- 1) The Debtor filed his Chapter 13 case on 5/11/2023.
- 2) By Order of the Court on 9/12/2023, Debtor was to file an Amended Plan and Amended 2016B form within 30 days.
- 3) Debtor filed Amended 2016B form on October 11, 2023.
- 4) An Order Dismissing the Case was filed by the Court on October 13, 2023, as the Amended Chapter 13 Plan had not been filed.
- 5) Debtor had missed attorney's calls and emails regarding the need for signatures on the Amended Plan.
- 6) Debtor has since met with Attorney to review and sign the Amended Plan, which is being filed concurrently with this Motion.
- 7) Debtor should be entitled to relief from the order of dismissal to ensure fairness in their case.

WHEREFORE, Debtor asks that the Court grant this motion for relief from the Dismissal Order and for such other relief as is just and proper.

/s/ Ryan P Worden
Ryan P Worden
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2023, a copy of the foregoing Motion for Relief from Order Pursuant to Fed.R.Bankr.P. 9024 was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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/s/ Ryan P Worden

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